

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION



UNITED STATES OF AMERICA

v.

ALEXIS AMANI SMITH,

Defendant.

Case No. 1:24-cr-168

Hon. Rossie D. Alston, Jr.

STATEMENT OF FACTS

The United States and the defendant, ALEXIS AMANI SMITH, agree that at trial, the United States would have proven the following facts beyond a reasonable doubt with admissible and credible evidence:

1. On or about December 29, 2022, at Fort Belvoir, within the special maritime and territorial jurisdiction of the United States and within the Eastern District of Virginia, the defendant, ALEXIS AMANI SMITH ("SMITH"), entered the AAFES Main Exchange ("the Exchange").

2. While at the Exchange, SMITH began to knowingly steal several items of merchandise belonging to the store. SMITH then walked past the final point of purchase with five items – perfume and earrings – without rendering any payment. The total aggregate cost of all items stolen was \$342.99 in U.S. currency.

3. After SMITH exited the Exchange while carrying the merchandise, an employee of the Exchange, a loss prevention officer (Victim-1) approached SMITH, questioned her about her apparent theft of merchandise, and requested identification. A verbal altercation began between the two. At some point, SMITH placed the stolen merchandise on the floor. SMITH then

quickly exited the Exchange and entered her vehicle, which was parked in the Main Exchange parking lot.

4. Victim-1 followed SMITH to the parking lot to obtain the vehicle license plate number. While Victim-1 was standing directly in front of SMITH's vehicle, SMITH accelerated the vehicle, striking Victim-1's knees and shins. Victim-1 then placed her hands on the hood of SMITH's vehicle to maintain her balance while yelling for SMITH to stop.

5. Despite Victim-1's request that SMITH stop the vehicle, and despite seeing Victim-1's presence in front of her car, SMITH accelerated again towards Victim-1. These actions caused the vehicle to strike Victim-1 and threw Victim-1 onto an adjacent vehicle and then onto the pavement. SMITH then continued to accelerate and left the Main Exchange. While SMITH sped away, other witnesses came to Victim-1's aid.

6. When SMITH accelerated her vehicle into Victim-1 she knew that the vehicle was capable of inflicting serious bodily injury or death to another person, and did so anyway. As a result of the vehicle strike, Victim-1 suffered a strained knee with bruising on both her knees, her forearm, and her shoulder.

7. The actions of the defendant, as recounted above, were in all respects knowing and deliberate, and were not committed by mistake, accident, or other innocent reason.


8. This statement of facts includes those facts necessary to support the plea agreement between the defendant and the United States. It does not include each and every fact known to the defendant or to the United States, and it is not intended to be a full enumeration of all of the facts surrounding the defendant's case.

Respectfully submitted,

Jessica D. Aber
United States Attorney

Date: October 23, 2024

By: _____



Nicholas A. Durham
Assistant United States Attorney

After consulting with my attorney and pursuant to the plea agreement entered into this day between me and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.



Alexis Amani Smith
Defendant

I am Hasina Lewis, the defendant's attorney. I have carefully reviewed the above Statement of Facts with her. To my knowledge, her decision to stipulate to these facts is an informed and voluntary one.



Hasina A. Lewis, Esq.
Counsel for the Defendant